

**REMARKS**

In response to the Office Action mailed December 3, 2003, Applicant respectfully requests reconsideration. Claims 1-18 were previously pending in this application. Claims 1, 17, and 18 are amended herein and claims 19-38 are newly added. As a result, claims 1-38 are now pending for examination and the application as presented is believed to be in condition for allowance.

**Rejections Under 35 U.S.C. §103**

The Office Action rejected claims 1, 3, 4, 6, 8, 10-12, 14, and 17-18 under 35 U.S.C. §103(a) as purportedly being obvious over Reber (6,061,758). The Office Action further rejected dependent claims 2, 5, 7, 9, 13, 15, and 16 under 35 U.S.C. §103 as purportedly being obvious over Reber in view of various other references. Applicant respectfully traverses each of these rejections.

First, the modification of Reber suggested in the Office Action is improper. Second, even if one were to modify Reber in the manner suggested in the Office Action, Applicant's claims patentably distinguish over Reber.

Initially, Applicant's note that the rejection set forth in the Office Action appears unclear and the Office Action appears to be internally inconsistent. Specifically, at paragraph 2 on page 2, in response to Applicant's argument that Reber does not disclose or suggest that dependencies exist between files, the Office Action asserts, “[t]he media are retrieved based on a log or the set of records. The media depends on the log file in order to be retrieved.” Thus, at page 2, the Office Action asserts that Reber discloses dependencies between files.

However, on page 5, the Office Action asserts that “Reber does not explicitly teach the dependent file.” Thus, it is unclear whether the Examiner believes that Reber teaches dependent files or does not teach dependent files. Clarification is respectfully requested. For the purposes of this response, because the Examiner rejected Applicant's claims under 35 U.S.C. §103, Applicant assumes the Examiner believes that Reber does not explicitly teach dependencies between files.

**1. One Of Skill In The Art Would Not Have Been Motivated To Modify Reber In  
The Manner Suggested In The Office Action**

The Office Action asserts that Reber does not explicitly teach the dependent file recited in claim 1. However, the Office Action asserts that Reber discloses at col. 4, lines 57-60 an identifier that represents the dynamic link or binding of a client's need for media and the actual source of the media to be used. The Office Action asserts that this paragraph teaches, "dependent file is the data depended on the identifier." and that "it would have been obvious to one ordinary skill in the art at the time of the invention was made to including the media data that depending on the identifier to allow the user to search for the depend data based on the identification."

Initially, it is unclear how the Office Action is proposing to modify Reber. The Office Action apparently asserts that it would have been obvious to modify Reber "to including the media data that depending on the identifier." Applicant interprets this to mean that the Examiner believes that because Reber teaches an identifier associated with media, it would have been obvious to create data that is dependent on the identifier. Applicant respectfully disagrees with this assertion.

First, Applicant respectfully disagrees that col. 4 lines 57-60 teaches that a dependent file is data dependent on the identifier, as the Office Action asserts. At col. 4, lines 57-60, Reber teaches that a client may use an identifier to access the media associated with that identifier. The media is not dependent on the identifier, but rather is identified by the identifier and accessed using the identifier.

Second, Applicant respectfully disagrees that the identifier would "allow the user to search for the depend data based on the identification," as the Office Action asserts. The identifier taught by Reber at col. 4, lines 57-60 is an identifier that is associated with specific media data. Reber teaches that this identifier may be provided to a client in response to a client's request to access the media so that the identifier may be used in any other future requests from the client for that specific media. Thus, Reber teaches that the identifier may be used to access the specific media with which it is associated. Reber does not teach or suggest that the identifier may be used to access data other than the specific media with which it is associated. In no way

does Reber suggest that the identifier may be used to search for dependent data, as the notion of dependent data is not even present in Reber. Therefore, there is no motivation to modify Reber in the manner suggested in Office Action and the rejection of claims 1-18 under 35 U.S.C. §103(a) should be withdrawn.

## **2. Applicant's Claims Patentably Distinguish Over Reber**

Even if one were to modify Reber in the manner suggested in the Office Action, Applicant's claims still patentably distinguish over Reber.

As discussed above, the Office Action proposes to modify Reber to include media files that are dependent on identifiers. This is very different from Applicant's claims which relate to data files that are dependent on other data files, and not identifiers.

Specifically, claim 1 is directed to a method of operating a computer system to validate the data stored in a plurality of data files in a database each of said data files having an associated file type and being arranged in a plurality of data stores in said data base, wherein at least one of said data files is a data dependent file containing data dependent on data in one or more other files of said data store. The method comprises the steps of: selecting a file locator which is associated with a respective one data store in said data base; using said selected file locator for identifying a first dependent file and identifying one or more other files on which said first file is dependent; for each identified file, selecting a first file reader associated with the file type of the identified file; using said selected first file reader, determining a predetermined parameter of said identified file; comparing the predetermined parameter from the first file with that from the or each other file; and responsive to said comparison step, providing an output signal for each data file indicating whether the data file is valid.

Reber fails to teach or suggest at least "using said selected file locator for identifying a first dependent file and identifying one or more other files on which said first file is dependent." The Office Action asserts that Reber discloses media files that are dependent on identifiers. Even if this assertion were accurate (which it clearly is not), Reber still does not teach identifying a file on which a first file is dependent, as Reber purportedly only discloses data that is dependent on identifiers, and not files.

Thus, claim 1 patentably distinguishes over Reber. Accordingly, it is respectfully requested that the rejection of claim 1 under 35 U.S.C. §103(a) be withdrawn.

Claims 2-9 depend from claim 1 and are patentable for at least the same reasons. Accordingly, it is respectfully requested that the rejection of claims 2-9 under 35 U.S.C. §103(a) be withdrawn.

Claim 10 is directed to a computer system arranged to validate data stored in a plurality of data files in a data base each of said data files having an associated file type and being arranged in a plurality of data stores in said data base, wherein at least one of said data files is a data dependent file containing data dependent on data in one or more other files of said data base. The computer system comprises: a plurality of file locators each associated with a respective data store in said data base and arranged to identify a first data dependent file in said associated data store and one or more other files in said data base on which said first file is dependent; a plurality of file readers each associated with a respective file type and each arranged to determine a predetermined parameter for at least one identified file having that associated file type; comparison means arranged to compare the predetermined parameter determined for said first file, with the predetermined parameter determined for each other file; and output means responsive to said comparison means and having an output which indicates whether said first file is valid.

As should be clear from the discussion above, Reber fails to disclose or suggest at least "a plurality of file locators each associated with a respective data store in said data base and arranged to identify a first data dependent file in said associated data store and one or more other files in said data base on which said first file is dependent."

Thus, claim 10 patentably distinguishes over Reber. Accordingly, it is respectfully requested that the rejection of claim 10 under 35 U.S.C. §103(a) be withdrawn.

Claims 11-16 depend from claim 10 and are patentable for at least the same reasons. Accordingly, it is respectfully requested that the rejection of claims 11-16 under 35 U.S.C. §103(a) be withdrawn.

Claim 17 is directed to a computer program product comprising a computer readable medium having thereon: computer program code means, when said program is loaded to make the computer perform a method to validate data stored in a plurality of data files in a database

each of said data files having an associated file type and being arranged in a plurality of data stores in said data base, wherein at least one of said data files is a data dependent file containing data dependent on data in one or more other files of said data store. The method comprises the steps of: selecting a file locator which is associated with a respective one data store in said data base; using said selected file locator for identifying a first dependent file and identifying one or more other files on which said first file is dependent; for each identified file, selecting a first file reader associated with the file type of the identified file; using said selected first file reader, determining a predetermined parameter of said identified file; comparing the predetermined parameter from the first file with that from the or each other file; and responsive to said comparison step, providing an output signal for each data file indicating whether the data file is valid.

As should be clear from the discussion above, Reber fails to teach or suggest at least “using said selected file locator for identifying a first dependent file and identifying one or more other files on which said first file is dependent.” Thus, claim 17 patentably distinguishes over Reber. Accordingly, it is respectfully requested that the rejection of claim 17 under 35 U.S.C. §103(a) be withdrawn.

Claim 18 is directed to a computer readable medium, having a program recorded thereon, where the program is to make the computer perform a method to validate data stored in a plurality of data files in a database each of said data files having an associated file type and being arranged in a plurality of data stores in said data base, wherein at least one of said data files is a data dependent file containing data dependent on data in one or more other files of said data store. The method comprises the steps of: selecting a file locator which is associated with a respective one data store in said data base; using said selected file locator for identifying a first dependent file and identifying one or more other files on which said first file is dependent; for each identified file, selecting a first file reader associated with the file type of the identified file; using said selected first file reader, determining a predetermined parameter of said identified file; comparing the predetermined parameter from the first file with that from the or each other file; and responsive to said comparison step, providing an output signal for each data file indicating whether the data file is valid.

As should be clear from the discussion above, Reber fails to teach or suggest at least “using said selected file locator for identifying a first dependent file and identifying one or more other files on which said first file is dependent.” Thus, claim 18 patentably distinguishes over Reber. Accordingly, it is respectfully requested that the rejection of claim 18 under 35 U.S.C. §103(a) be withdrawn.

**Newly Added Claims**

Claims 19-38 are newly added in this application. Claims 19-26 and 37 depend from independent claim 17. Claims 27-34 and 38 depend from independent claim 18. Claim 35 depends from independent claim 1 and claim 36 depends from independent claim 10. Each of these claims is patentable for at least the same reasons as its respective independent claim.



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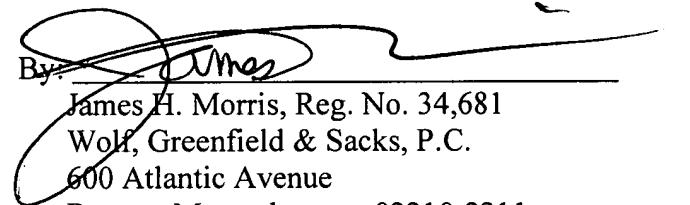
### CONCLUSION

In view of the foregoing amendments and remarks, this application should now be in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicant's attorney at the telephone number listed below.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 23/2825.

Respectfully submitted,

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